

# EXHIBIT H

**Alterra Am. Ins. Co. v. National Football League, et al., No. 652813/2012 and**  
**Discover Prop. & Cas. Co. v. National Football League, et al., No. 65933/2012**

**Categorical Privilege Log of Non-Party NFL Member Clubs**

November 30, 2018

This log<sup>1</sup> categorizes documents retrieved and reviewed, but withheld as privileged from the Non-Party Member Clubs ("Non-Party Clubs") (the "Non-Party Clubs") productions made in response to the subpoenas served separately to each of the Non-Party Clubs between August 2017 and August 2018 (the "Subpoenas").<sup>1</sup> In response to the Subpoenas, as limited by the Non-Party Clubs' respective objections served between November 2017 and August 2018, counsel for the Non-Party Clubs reviewed documents retrieved for privilege on a document-by-document basis. The documents withheld pursuant to an applicable privilege are reflected on the categorical log below. The number of documents withheld per category is inclusive of email communications, attachments to emails and standalone documents.

Category No.	Date	Category Description	Party	Document Type	Privilege	Documents Withheld/Redacted
1	In effect as of November 30, 2018	Written policies and correspondence providing or reflecting legal advice regarding document and data management, retention and preservation requirements in accordance with applicable law	Clubs: Arizona Cardinals, Baltimore Ravens, Buffalo Bills, Carolina Panthers, Chicago Bears, Cleveland Browns, Houston Texans, Indianapolis Colts, Jacksonville Jaguars, Miami Dolphins, Minnesota Vikings, New York Jets, Philadelphia Eagles, Pittsburgh Steelers, San Francisco Forty-Niners	Emails, Documents	Attorney-Client; Work Product	24

<sup>1</sup> The Non-Party Clubs expect to update this log on an ongoing basis as they complete their rolling production of documents responsive to the Subpoenas.